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Via electronic filing

September 16, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: East Ascension Telephone Company, LLC – Gonzales, LA
Petition for Waiver of Section 54.301 of the Commission's Rules
Filed April 9, 2004
CC Docket No. 96-45
Supplement to the Record

Dear Madam Secretary:

On April 9, 2004, East Ascension Telephone Company, LLC ("EATEL") sought relief from a strict interpretation of Section 54.301(b) of the Commission's Rules requiring that Local Switching Support ("LSS") data be submitted as of October 1 to secure the flow of LSS cost recovery monies from the Universal Service Administrative Company ("USAC") for calendar year 2004. As noted in that filing, an administrative oversight caused a one-day delay in the filing of administrative data, a delay which neither burdened any other party nor precluded USAC from performing its duties. EATEL's pleading demonstrated that the public interest would be served by grant of its waiver request.

Sixteen months later, with the year-long absence of LSS resulting in a cost recovery deficit of more than \$500,000, EATEL's service area has become a staging area for relief efforts in the ravaged Louisiana Gulf Coast.¹ The Federal Emergency

¹ As the Commission has repeatedly recognized over the past few weeks, the devastation inflicted by Hurricane Katrina was enormous, requiring prompt Commission action to "facilitate carrier flexibility . . . to serve hurricane victims in the affected areas." *Numbering Resource Optimization*, Order, CC Docket No. 99-200, FCC 05-164 (rel. Sept. 4, 2005) at para. 1. See also *Telephone Number Portability*, *Numbering Resource Optimization*, Order, CC Docket Nos. 95-166 and 99-200, FCC 05-161 (rel. Sept. 1, 2005).

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Management Agency ("FEMA"), the Federal Bureau of Investigation ("FBI"), the National Guard, the American Red Cross and numerous other support agencies have established large bases in the EATEL service area, located approximately 50 miles west of New Orleans. Simultaneously, large numbers of evacuees are currently residing in area shelters and private residences. In addition, uprooted businesses from the New Orleans area relocating in the EATEL service area.

The immediate demand for access to basic and advanced telecommunications services is unprecedented in EATEL's history. While EATEL is responding to this demand, its resources, including manpower and capital, are severely extended. Accordingly, the Commission's prompt consideration of and response to the outstanding waiver request would serve the public interest, providing certainty to EATEL regarding cost recovery methodology as it moves forward to assist in addressing the immediate public welfare issues associated with ensuring that telecommunications services are available to relief agencies and evacuees.

Respectfully submitted,



Sylvia Lesse
Counsel for
East Ascension Telephone Company, LLC

cc: Kevin J. Martin, Chairman*
Commissioner Kathleen Q. Abernathy*
Commissioner Michael J. Copps*
Commissioner Jonathan S. Adelstein*
Thomas Navin, Chief, Wireline Competition Bureau*
Kenneth Moran, Director, Office of Homeland Security, Enforcement Bureau*
Gina Spade, Asst. Div. Chief, Telecommunications Access Policy Division,
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**Via hand delivery*